

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KATHERINE MORENO and AARON DUMAS,
individually and on behalf of other persons
similarly situated who were employed by SONY
MUSIC ENTERTAINMENT,

Plaintiffs,

- against -

SONY MUSIC ENTERTAINMENT, and/or any
other entities affiliated with or controlled by
SONY MUSIC ENTERTAINMENT,

Defendants.

Case No. 13 Civ. 5708 (GBD)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Lloyd R. Ambinder, the exhibits annexed thereto, and the Memorandum of Law in Support, the undersigned will move this Court before United States District Judge George B. Daniels, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, 10007, on a return date set by the Court, to permit Court authorized notification to members of the putative collective pursuant to the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 216(b), together with such other and further relief as the Court may deem just and proper.

Dated: New York, New York
April 2, 2014

VIRGINIA & AMBINDER, LLP

/s/ Lloyd R. Ambinder, Esq.
LaDonna M. Lusher, Esq.
Suzanne B. Leeds, Esq.
111 Broadway, Suite 1403
New York, New York 10006
Tel: (212) 943-9080
Fax: (212) 943-9082
lambinder@vandallp.com

LEEDS BROWN LAW, P.C.
Jeffrey K. Brown, Esq.
Daniel H. Markowitz, Esq.
Michael A. Tompkins, Esq.
One Old Country Road, Suite 347
Carle Place, New York 11514
Tel: (516) 873-9550
jbrown@leedsbrownlaw.com

Attorneys for Plaintiffs and the Putative Collective

To: PROSKAUER ROSE LLP
Elise Bloom, Esq.
Mark Batten, Esq.
Alison Langlais, Esq.
Eleven Times Square
New York, New York 10036
Tel: (212) 969-3410
Fax: (212) 969-2900
ebloom@proskauer.com

Attorneys for Defendants